



September 20, 2021

Washington State Department of Agriculture (WSDA)  
PO Box 42560  
Olympia, WA 98504-2560

Dear Tim Elliott,

Rivian appreciates the opportunity to submit comments regarding rulemaking Chapter 16-662 WAC, specifically covering the requirement for electric vehicle service providers (EVSPs) to meet and maintain nonproprietary interoperability standards for publicly available level 2 and DC fast charger EVSEs.

Please find Rivian's responses below to the specific questions posed regarding Section 6 of Second Substitute Senate Bill 5192:

***What should we be trying to achieve?***

Core to Rivian's overall mission is to encourage the increasing number of EV drivers to adventure into the outdoors by strategically deploying L2 charging stations at national and state parks. To enable these electric adventures across all makes and models of electric vehicles, interoperability is essential.

Rivian therefore supports Washington State's efforts to enable interoperability through the use of nonproprietary interoperability standards. However, it is important to note there are several layers of standards operating behind the scenes of a customer experience, all of which are at varying levels of maturity as the industry continues to innovate and evolve.

Therefore, Rivian encourages WSDA to balance the need for specific interoperability standards requirements with the ongoing innovation occurring in the industry. If specific requirements must be identified, ensure reasonable phase-in timelines are implemented (18-24 months) and technology reviews are conducted every 2 years to confirm requirements are in step with the industry progress.

**Which national and international best practices/standards should we be considering aligning the rule with? OCPI? OCPP? Others? A combination of multiple standards?**

OCPP and OCPI will enable interoperability across two layers of information communication –

- (1) EVSE to Cloud Backend** – enables communication and control of EVSE hardware by any Cloud Backend using OCPP.
- (2) Cloud Backend to Cloud Backend** – enables EV driver roaming across EVSP networks using OCPI to connect to multiple EVSP cloud backends.

At this point in time, Rivian encourages WSDA to focus on standards required for these two layers of interoperability with OCPP and OCPI as the top candidates. However, it is important to

note OCPI, as currently implemented, should be viewed as a “floor” for implementation, specifically regarding security of sensitive information, such as customer payment information.

Rivian also encourages WSDA to **not** mandate requirements for standards handling communications between the EV and EVSE (outside of SAE J1772).

Currently, there are several working groups and industry stakeholders working on improving pieces of ISO 15118-2 (and –20, *currently in progress*), specifically regarding security ([SAE EV Public PKI Working Group](#)) and bi-directional power flow (i.e. vehicle-to-grid (V2G)). These active work streams have a high likelihood to produce materially improved technical solutions to ISO 15118-2 (and -20) and will impact industry implementation. Since ISO 15118 is considered by many to be the leading contender for standardization between EV and EVSE it critical to acknowledge the current innovation underway in the industry and provide the time for further maturation before solidifying requirements.

**When selecting the standards that this rule will align with:**

- **What version? Does a specific version need to be specified or can other requirements be used to meet this requirement and maintain flexibility?**

Regardless of the standards selected and the versions of the standards, Rivian encourages WSDA to establish clear compliance phase-in timelines (preferably 18 – 24 months). In addition, any change in requirements, such as moving to newer version of a standard, should happen only after a technology review every 2 years has been completed to confirm the status of implementation by industry stakeholders.

**Considering that California has already adopted certain standards, what should we be considering regarding standards that may not align exactly with theirs?**

Rivian encourages WSDA to rely on stakeholder feedback regarding what is and is not feasible if Washington State’s standards don’t align with California’s. Industry stakeholders will only be able to provide concrete technical feedback on this topic once greater clarity is established regarding Washington State’s preferred path forward.

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Rivian appreciates the opportunity to provide initial feedback and looks forward to continued discussions with the Department and industry stakeholders on this important topic.

Sincerely,

Kelsey G. Johnson  
Lead Policy Advisor  
Rivian